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June 21, 2023

VIA ECF

The Honorable John G. Koeltl
United States District Judge
United States Courthouse, Courtroom 14A
500 Pearl Street
New York, NY 10007

Re: Grant et al. v. Trump et al., Case No. 1:20-cv-07103-JGK

Dear Judge Koeltl:

This firm represents defendants Donald J. Trump and Donald J. Trump For President, Inc. (collectively, "Defendants"), in the above-referenced action. We write pursuant to Your Honor's Individual Practices Rule I.E., and with consent from Plaintiffs, to request an extension of the deadline for the parties to submit the Joint Pretrial Order, which is currently scheduled for June 22, 2023. This request is being made because Defendant's lead counsel Darren Saunders has taken an unexpected leave of absence from our firm for personal reasons for an extended period of time. Defendants' counsel can provide additional confidential information to the Court, if needed. The Parties have conferred and respectfully request additional time until after August 1, 2023, to file the joint pre-trial order.

Separately, Defendants respectfully request re-scheduling of all post-discovery deadlines including, specifically, the deadline for submission of dispositive motions. The last ordered deadline to file dispositive motions was March 17, 2023 (Dkt. 77), and the final deadline for expert discovery was June 7, 2023 (Dkt. 92). The reason for this request is that multiple extensions of time were necessary to schedule the deposition of Mr. Scavino and the subsequent expert discovery period, which resulted in a situation in which dispositive motions were required to be filed almost three months before the close of expert discovery period. Therefore, any dispositive motions would have been required to be submitted without a full record. The request to reset all post-discovery deadlines (other than the pre-trial order date as stated in the first paragraph above) is not joined by Plaintiffs.

In view of the foregoing, Defendants respectfully request that the deadline for filing dispositive motions and the pre-trial order be reset for dates after August 1, 2023.

We thank the Court for its consideration of the above, and we are available for a conference call with the Court, if the Court believes it would be helpful.

Respectfully,

JHK:ml

cc: All counsel of record (via ECF)